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Filing date: **12/16/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92062561
Party	Plaintiff L & R Group of Companies
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Submission	Motion for Default Judgment
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Date	12/16/2015
Attachments	L&R Group of Companies Motion for Default Judgment.pdf(269087 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

L & R GROUP OF COMPANIES,)	
)	
Petitioner,)	
)	Cancellation No. 92062561
v.)	
)	Reg. No. 4399779
JUMP ON EXPRESS, LLC,)	Mark: JOE
)	
Registrant.)	

PETITIONER’S MOTION FOR DEFAULT AND DEFAULT JUDGMENT

Petitioner L & R GROUP OF COMPANIES (hereinafter “Petitioner”) by and through their undersigned counsel, hereby move for entry of default and default judgment against registrant JUMP ON EXPRESS, LLC (hereinafter “Registrant”) in the above-captioned matter, pursuant to Fed. R. Civ. P.55(c); 37 C.F.R. § 2.106(a); and TBMP §§ 312.01, 508, on the ground that Registrant has failed to file an Answer to Petitioner’s Petition for Cancellation, which Answer was due on December 14, 2015, and in support thereof state as follows:

1. On December 1, 2014, Petitioner through the undersigned counsel filed Application Serial Nos. 86468206 and 86468233 (stylized) in the United States Patent and Trademark Office for the mark JOE’S AIRPORT PARKING in among other classes, International Class 039 for "provision of car parking facilities featuring self-parking, valet parking services, transportation of persons and property by shuttle vehicles, passenger luggage transportation services, parking lot services and car towing services".

2. On November 2, 2015, Petitioner through undersigned counsel, filed a Petition for Cancellation of Registrant's Trademark Registration No. 4399779 for the mark JOE, and served that Petition on Registrant the same day.
3. Registrant's Answer to Petition for Cancellation was due December 14, 2015.
4. Registrant did not file an Answer to Petitioner's Petition for Cancellation on or before December 14, 2015, and has not filed an Answer or any other document in this proceeding, as of the date of this filing, December 16, 2015.
5. Registrant has not filed a motion requesting an extension of time to Answer. Registrant has not contacted Petitioner or their counsel to request an extension of time to file an Answer, and has not otherwise contacted Petitioner or their counsel.
6. Registrant's time to Answer expired on December 14, 2015.

WHEREFORE, Petitioner L & R GROUP OF COMPANIES requests that: the Motion for Default and Default Judgment be granted; a default be entered against Registrant; and that Registration No. 4399779 for the mark JOE owned by Registrant be cancelled.

Respectfully submitted,

Dated: December 16, 2015

DE NOVO LEGAL, PC

By: _____
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Attorney for Petitioner L & R Group of Companies

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing PETITIONER'S MOTION FOR DEFAULT AND DEFAULT JUDGMENT has been served on Jump On Express, LLC by mailing said copy on December 16, 2015, via First Class Mail, postage prepaid to:

Jump On Express, LLC
1315 Corso Palermo CT #2
Naples, FL 34105

_____/mjohnson/_____

Maria Johnson